

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

RACHEL RAMSBOTTOM, ALEXIS)	
BOWLING, JENNA HOUSTON,)	CIVIL ACTION NO. 3:21-cv-00272
)	
Plaintiffs,)	
)	
)	
)	
v.)	
)	JUDGE ALETA A. TRAUGER
)	
LORIN ASHTON,)	
)	
Defendant.)	
)	

PLAINTIFFS' MOTION FOR LEAVE TO FILE CERTAIN EXHIBITS UNDER SEAL
PURSUANT TO L.R. 5.03 & L.R. 7.01

Pursuant to the Local Rules of Court for the United States District Court, Middle District of Tennessee, Plaintiffs here by move the Court for leave to file certain documents under seal.

For the reasons set forth in the accompanying Memorandum Of Law in Support of Plaintiffs' Motion, Plaintiffs request leave to file certain exhibits under seal.

WHEREFORE, For the reasons set forth in the Plaintiffs' Motion and corresponding memorandum of law, Plaintiffs respectfully request this Honorable Court to **GRANT** Plaintiffs' Motion For Leave To File Certain Exhibits Under Seal.

Respectfully submitted,

LAFFEY, BUCCI & KENT, LLP

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Date: October 14, 2022

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**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE TO
FILE CERTAIN EXHIBITS UNDER SEAL PURSUANT TO L.R. 5.03 & L.R. 7.01**

Pursuant to the Local Rules of Court for the United States District Court, Middle District of Tennessee 5.03 and 7.01 Plaintiffs Rachel Ramsbottom, Alexis Bowling, and Jenna Houston hereby move the Court for Leave to File Certain Exhibits Under Seal and in support thereof, aver as follows:

On May 20, 2022, Pursuant to Rules 26(b)(1) and Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs propounded Interrogatories and Requests for Production of Documents upon Defendant Ashton.

On June 20, 2022, Defendant Lorin Ashton produced Objections and Responses.

After several telephonic meet and confers between the parties addressing the above discovery Interrogatories and Requests for Production, this discovery dispute followed. On September 28, 2022, after a telephonic conference with the parties, the Court issued its September 28, 2022, Order, with a number of discovery rulings. The Court further permitted the parties to brief certain outstanding discovery disputes, including: “[w]hether the plaintiffs may have

discovery related to other victims who are not plaintiffs in this lawsuit,” and “whether the plaintiffs may seek discovery of confidentiality agreements and settlements that the defendant has made with persons who are not parties to this lawsuit.”

Also discussed during the September 28, 2022, conference was the status of a Protective Order to be entered in this case. The Court provided guidance to the parties regarding certain provisions of same. The parties represented to the Court that the parties had agreed, pending the entry of the Protective Order, that all discovery materials exchanged would be made confidential. This agreement was reached given the fact that discovery materials will include certain personal and sensitive information that the parties will wish to mark as confidential. The parties had previously reached this agreement so as to facilitate the ongoing exchange of discovery materials while awaiting the entry of the Protective Order. It is the understanding and recollection of counsel for Plaintiffs that the Court approved of this protocol.

On October 14, 2022, Plaintiffs will file a Motion and supporting Memorandum addressing the outstanding discovery disputes (entitled “Plaintiffs’ Motion To Compel Responses To Requests For Production Of Documents Pursuant To Fed. R. Civ. P. 37”). As part of this Motion, Plaintiffs will attach, *inter alia*, two documents: Exhibit A which are Defendant Lorin Ashton’s Objections and Responses to Plaintiffs First Set of Requests for Production of Documents and Exhibit B which are Defendant Lorin Ashton’s Objections and Responses to Plaintiff Rachel Ramsbottom’s First Set of Interrogatories.

Pursuant to the agreement made by the parties, and pending the entry of a Protective Order in this matter, Plaintiffs seek leave to file Exhibits A and B to their Motion to Compel under seal. Based on the agreement of counsel that **all** materials be treated as confidential, filing a redacted version of these exhibits would be impracticable. *See L.R. 5.03(c)* (“If practicable, the party

requesting that some or all of a filing be sealed, shall also separately file a redacted version. If the filing of a redacted version is impracticable, the motion to seal must include an affirmative statement to that effect.”).

Counsel for Plaintiffs contacted counsel for Defendant and there is no objection to this Motion for Leave to File Exhibits Under Seal.

Based on the foregoing there is good cause for leave to file Exhibits A and B to Plaintiffs' Motion to Compel under seal.

WHEREFORE, For the reasons set forth in the Plaintiffs' Motion and corresponding memorandum of law, Plaintiffs respectfully request this Honorable Court to **GRANT** Plaintiffs' Motion For Leave To File Certain Exhibits Under Seal.

Respectfully submitted,

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**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR LEAVE TO FILE
CERTAIN EXHIBITS UNDER SEAL PURSUANT TO L.R. 5.03 & L.R. 7.01**

This matter is pending before the Court on Plaintiffs' Motion For Leave To File Certain Exhibits Under Seal Pursuant To L.R. 5.03 & L.R. 7.01. The Court having read the Motion and any Responses, and having fully considered the matter herein, it is hereby **ORDERED** as follows:

- (1) Plaintiffs are granted leave to file Exhibits A and B to Plaintiffs' Motion To Compel Responses To Requests For Production Of Documents Pursuant To Fed. R. Civ. P. 37 under seal and shall follow such procedures as are necessary to effectuate this Order.

This __ day of October, 2022.

Hon. Aleta A. Trauger

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 14th day of October, 2022:

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